



Santa Fe College Rules Manual

Title: Student Loan Practices Code of Conduct Rule 2.11

General Authority: FS 1001.64
Law Implemented: FS 1001.64, 112.313

Effective Date: June 25, 2008

The District Board of Trustees recognizes that ensuring the integrity of the student financial aid process is critical to providing fair and affordable access to higher education in Florida. Therefore, the Board hereby adopts the following guiding principles that shall be effective immediately. These guidelines are designed to avoid any potential for a conflict of interest between Santa Fe College, its students, or their parents in the student financial aid process. Accordingly, the College shall adhere to the following principles in the College's financial aid operations:

A. College employees should receive no personal benefit.

No officer, trustee, or employee of the College shall accept anything of more than nominal value on his or her behalf or on behalf of another person or entity from any lending institution.¹ For example, cash, stocks, gifts, entertainment, expense-paid trips, etc. should never be accepted from a lending institution. Likewise, an individual should never receive payment or reimbursement from a lending institution for lodging, meals, or travel to conferences or training seminars. However, an officer, trustee, or employee of the College may:

1. conduct non-College business with any lending institution and, subject to state law, receive value in connection with such non-College business, so long as such value is not intended to influence the officer, trustee, or employee in conducting College business;
2. conduct College business and, subject to state law, receive value on behalf of the College that is unrelated to the student loan activities of the lending institution;
3. attend conferences and meetings of tax-exempt or not-for-profit organizations that are funded or sponsored by more than one entity and, subject to state law, receive materials, refreshments, and other things of like value provided at such professional conferences and meetings; and,
4. hold membership in, serve on the board of, or participate in the activities of any tax-exempt organization and, subject to state law, receive travel reimbursements and other things of like value from the tax-exempt organization for such activities.

B. College employees should not serve on lender advisory boards for remuneration.

No officer, trustee, or employee of the College who makes financial aid decisions for the College or who is employed in, supervises, or otherwise has responsibility or authority over the College's financial aid office shall receive any remuneration for serving as a member or participant of a student loan advisory board of a lending institution or any reimbursement of expenses for such service.

Any College employee serving on a lender advisory board must notify the College president in writing, including the name of the lender, the date service commenced, and any other information deemed relevant by the employee or requested by the president.

C. The College should not provide any advantage to a lending institution.

The College shall not accept anything of value from any lending institution in exchange for any advantage or consideration provided to the lending institution related to its student loan activities, including but not limited to revenue-sharing, printing costs, or below-cost computer hardware or software.² Likewise, the College shall not allow any lending institution to:

1. staff the College's financial aid office at any time; or
2. communicate with the College's students or their parents in such a manner as to create the impression that the lending institution is an employee or agent of the College in connection with the College's student financial aid operations, including through the use of mascots, logos, etc.
3. enter into any agreement with the College to provide alternative (i.e., non-federal or "opportunity") student loan programs if the provision of such alternative loan programs prejudices other students or parents.³

D. The College shall not create or utilize any lists of preferred or recommended lenders for student loans or similar ranking or designation unless specifically authorized by the Board of Trustees.

Footnotes

¹ Lending institution is any entity (other than an institution of higher education or a governmental entity such as the U.S. or Florida Department of Education) involved in the making, holding, consolidating, or processing of any student loans.

² The College may accept any assistance that is authorized by 34 C.F.R. 682.200(b)(5)(i) (definition of *Lender*) or other federal regulations.

³ The College may offer loans to its international students, at fair market rates, when such students would otherwise be unable to secure a domestic loan.